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Lead Counsel for the Indirect Purchaser Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-JST
Case No. 17-cv-04067-JST

MDL No. 1917

This Document Relates to:

Luscher, et al. v. Mitsubishi Electric Corp.,
No. 17-cv-04067-JST

**DECLARATION OF LAUREN C.
CAPURRO IN SUPPORT PLAINTIFFS'
ADMINISTRATIVE MOTION
PURSUANT TO L.R. 7-11 FOR LEAVE
FOR EXCESS PAGES**

Judge: Hon. Jon S. Tigar

1 I, Lauren C. Capurro, declare as follows:

2 1. I am an attorney duly licensed by the State of California and am admitted to practice
3 before this Court. I am a partner with the law firm Trump, Alioto, Trump & Prescott, LLP and my firm
4 serves as Lead Counsel for the Indirect Purchaser Plaintiffs (“IPPs”) in the above-captioned action. I
5 submit this declaration in support of IPPs’ Administrative Motion Pursuant to L.R. 7-11 For Leave For
6 Excess Pages (“Administrative Motion”). I have personal knowledge of the facts stated herein, and I
7 could and would competently testify thereto if called as a witness.

8 2. IPPs are moving for preliminary approval of a class action settlement with Mitsubishi
9 Electric Corporation (“Mitsubishi Electric”), which is the only defendant named in *Luscher, et al. v.*
10 *Mitsubishi Electric Corp.*, No. 17-cv-04067-JST.

11 3. The *Luscher* action is related to the above-captioned MDL No. 1917, which has been
12 pending for more than ten years. Mitsubishi Electric has been involved since 2011.

13 4. IPPs’ motion for preliminary approval describes the long procedural history of the
14 MDL, the settlement terms and negotiations with Mitsubishi Electric, the sufficiency of discovery, the
15 parties’ claims and defenses and the risks of continued litigation for IPPs, and IPPs’ preparations for
16 trial against the other defendants. IPPs also set forth a comprehensive notice program and a detailed
17 plan of distribution for the Court’s evaluation and approval. The plan of distribution is related to the
18 prior settlements in this case and therefore has required additional explanation.

19 5. In my opinion, based on the work I have done on the motion for preliminary approval,
20 and my knowledge of this case having worked on it for over ten years, an additional six (6) pages are
21 necessary to properly present the motion for preliminary approval to the Court.

22 6. Counsel for Mitsubishi Electric has informed me that they have no objection to this
23 motion.

24 I declare under penalty of perjury that the foregoing is true and correct. Executed on February
25 13, 2018, in San Francisco, California.

26
27 /s/ Lauren C. Capurro
28 Lauren C. Capurro